

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: AUG 6 2015

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Michigan Marine Terminal, River Rouge, Michigan

FROM: Katharina Bellairs, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Michigan Marine Terminal (MMT)

Facility Location: 255 Marion Avenue, River Rouge, Michigan 48218

Date of Inspection: October 2, 2014

Lead Inspector: Katharina Bellairs, Environmental Engineer, US EPA

Other Attendees:

1. Constantinos Loukeris, EPA Region 5
2. Curt D. Robinson, VP of Marketing and Operations, MMT
3. Alicia Cytacki Krall, VP of Administration, MMT
4. Jeff Jaros, NTH Consulting

Purpose of Inspection: Tanks Inspection

Facility Type: Petroleum Storage Products Facility

Regulations Central to the Inspection:

Arrival Time: 1:55 p.m. EST

Departure Time: 5:03 p.m. EST

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Ann McKeon-Ruediger and Gary Whittaker unless otherwise noted.

Process Description:

MMT is a petroleum products storage facility with 10 employees. The facility operates January through March from 7:00 a.m. to 5:00 p.m. and the rest of the year 4:00 a.m. to 5:00 p.m.

Tanks are leased by third party customers. MMT is rehabbing Tank A and plans to rehab Tanks B and C. Tanks 102, 103, 106, 107, and 108 are heated asphalt tanks. Tanks 110, 210, 211, 212, and 213 can also be heated. Tank 104 stores Number 6 fuel oil at 120 degrees F. Tank 105 was empty. Tank 109 stores vacuum gas oil (VGO) at 80 to 100 degrees F. Asphalt is stored at 300 degree F. The facility heats tanks with 10 natural gas fired heaters.

Staff Interview: We talked to Jeff Jaros of NTH, MMT's environmental consultant. We asked if the facility had a permit and were told it did not need one because it was exception through Michigan Rule 290.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

On our tour, we went to Tank 109 and imaged it with the FLIR and PID. Tank 211's top was 20 percent rusted. We took FLIR video 821 and picture 822 of tank 108, because there were puffs of emissions coming off the tank. On Tank 103, we took one video and picture and a PID reading of 50 ppm of a gauge port, and 2 videos and one picture of the southwest conservation vent.

Field Measurements: were taken during this inspection.

CLOSING CONFERENCE

Concerns: We explained that heated tank emissions are usually underestimated through AP-42. We stated we would likely send an information request.

SIGNATURES

Lead Inspector: [Signature] Date: 8/6/15

Section Chief: [Signature] Date: 8/6/15

APPENDICES AND ATTACHMENTS

FLIR Video and Photo Log